

REMARKS/ARGUMENTS

Claims 1-9 are pending in the present application. Claims 1-9 have been amended, and new claim 10 has been added. No new matter has been added with the present amendment. Reconsideration of the present application is respectfully requested in light of the following remarks.

Election/Restrictions

Applicant acknowledges the previous telephone conversation of 8/15/05 where a provisional election with traverse was made to prosecute the invention of species C, claims 1-9. Applicant has now amended claim 1 to include the element that the intermediate walls are formed as double walls as shown in Figs. 4 and 5a-c. Applicant notes that since the Examiner has examined all of the previously pending claims, that the present amendment does not add an additional burden on the Examiner in view of the previously made provisional election.

Drawings

The drawings have been objected to as noted in the Office Action. Each of the objections is addressed below.

Applicant agrees with the Office Action in that Fig. 1 can be construed generic to all embodiments of the protective screen. The basis of a first objection is that the bottom face of article 1a (support elements) appears to be in contact with article 4 (wall) in Fig. 2, while in Fig. 1, article 4 (wall) contacts article 1a (support element) only on the lateral side. The Office Action goes on to say that this discrepancy should be corrected. Applicant respectfully submits that such a discrepancy is immaterial to the embodiments of the present invention, and that the support element 1a's connection with the screen 1 is the same in both Figs. 1 and 2. The element 4 (wall) is shown as a reference surface to which the screen 1 may be connected with. The apparent discrepancy between element 4 (wall) and how it is in contact with the support element 1a, neither of which are elements of the presently claimed invention, can be explained by reference to the specification's description of Fig. 4, where it provides that:

"The screen wall element 2 is arranged above a suction space 3 which is formed on one side by the screen wall element 2 and on the opposite side

by a wall element 4 which can for example be a concrete plate. A base plate of a safety container, or a different constructional part at or in the safety container of a nuclear power plant, can also be used as the wall element 4."

Clearly, as can be seen, there is no discrepancy in the depiction of the wall element of Figs. 1 and 2. Applicant respectfully submits that a drawing correction to address this apparent discrepancy is not required.

The basis of a second drawing objection is that Figs. 2-4 do not show all the details for a clear disclosure of the invention, e.g., the perforation of all walls of the suction spaces, and spacer elements within the double walls. Applicant respectfully submits that the detailed description of the invention indeed does provide a clear disclosure of the invention, and that while having provided a clear written description, some of the details have been left out of certain drawings, to not create overly confusing drawings. However, relevant details have been provided throughout the drawings. For example, the fact that perforated wall segments are preferred in the construction of the cassettes is described throughout the written description (e.g., see Para. 9, 11, 28, 29, 30, and 31 of the substitute specification). However, the perforated segments are only actually shown on the appropriate detail drawing (e.g. Fig. 5a). Applicant respectfully submits that showing the detail of the perforated wall at Fig. 5a is an appropriate manner of doing so, since Fig. 2 shows an overview of the screen wall element that has four cassettes; Fig. 3 shows one cassette; Fig. 4 shows a portion of one cassette and Fig. 5a shows a section view thereof showing a perforated wall segment. Likewise, based on a similar rationale, spacer elements (24, 24.1, and 24.2) are also shown in the same sectional view of Fig. 5a. Applicant respectfully submits that a drawing correction to address this apparent discrepancy is not required.

Specification

While Applicant respectfully notes that the Applicant may be his own lexicographer, as set forth above, in order to address the objections to the specification, Applicant is submitting herewith a substitute specification.

Claim Objections

In order to further the prosecution of the present application, Applicant has amended the claims that set forth a plurality of elements such that each element of the claim is separated by a line indentation.

Claim Rejections - 35 U.S.C. § 112

Claim 5 has been rejected for allegedly being indefinite because it recites a broad recitation and also recites a narrower statement of range. In order to further the prosecution of the present application, Applicant has amended claim 5 so that it does not claim a broad range with a narrower range that falls within the broad range. New claim 10 has been added to provide an adequate level of protection for the narrower range.

Claim 3 and 5 have been rejected for allegedly being indefinite because they lack proper antecedent bases. In order to further the prosecution of the present application, Applicant has amended the claim as set forth above to ensure that they possess proper antecedent bases.

Claim Rejections 35 U.S.C. § 102 and 35 U.S.C. § 103

Claims 1-3 and 9 have been rejected under 35 U.S.C. 102(b) as allegedly being anticipated by United States Patent No. 5,876,551 to Toshihiko.

Claims 4-6 have been rejected under 35 U.S.C. 103(a) as allegedly being obvious over Toshihiko as applied to claims 1-3 and 9 and further in view of United States Patent No. 5,483,564 to Matzner et al. ("Matzner").

Claims 7-8 have been rejected under 35 U.S.C. 103(a) as allegedly being obvious over Toshihiko as applied to claims 1-3 and 9 and further in view of Matzner as applied to claims 4-6 and further in view of United States Patent No. 5,080,699 to Ho et al. ("Ho").

In order to further the prosecution of the present application, Applicant has amended independent claim 1 without acquiescence or prejudice. Applicant respectfully submits that the amended claim is not anticipated by Toshiko for the reasons set forth below. Furthermore, Applicant respectfully submits that claims depending from claim 1 are not obvious over a hypothetical combination of Toshihiko, Matzner and/or Ho, since the deficiencies of

Toshiko in failing to anticipate amended claim 1 are not overcome by the Matzner and/or the Ho references, for reasons set forth below.

The protective screen for screening off a suction space and a suction duct connected to it as claimed in the amended claim 1 is used in an emergency cooling system of a nuclear power plant, i.e. in a emergency case where the protective screen has to hold back insulation debris and chunks including fibrous materials without excessive increase in through-flow resistance. Toshihiko, on the other hand, describes a nuclear fuel assembly for use in a PWR comprising a bottom nozzle and an inlet filter member for primary cooling water to prevent the intrusion of foreign matters such as metal pieces into the fuel assembly where they may damage the fuel rods (*e.g. see* the abstract and col. 1, lines 32-47). Thus, the filter member disclosed by Toshihiko is not made for holding back a large amount of insulation debris and chunks but rather for holding back some single metal pieces. Moreover, Toshihiko does not disclose "spaced apart walls and intermediate walls and bent perforated wall segments between the walls and the intermediate walls in order to form screen pockets." Furthermore, Toshihiko does not disclose intermediate walls formed as double walls.

Matzner describes a three dimensional debris catching grid having a corrugated construction for use in a reactor fuel bundle (*e.g. see* Fig. 8B and the abstract). The catching grid is used to catch single objects such as metal pieces and to prevent them from intruding into the fuel bundle. Applicant respectfully submits that this kind of catching grid is certainly not intended to hold back large amounts of debris, since if the primary cooling water would contain large amount of debris, they would not be collected in the nuclear fuel bundle but rather in a more suitable location of the primary cooling system. Moreover, Matzner does not disclose intermediate walls in addition to the bent perforated wall segments in order to form a larger number of screen pockets.

In the Office Action the examiner held that any protrusions (of the corrugated construction) may be construed as a wall and may be taken as a double wall. In contrast, Applicant respectfully submits that as recited by amended claim 1 of the present application, the intermediate walls formed as double walls are distinct from the bent perforated wall segments.

Applicant submits that the intermediate walls formed as double walls are therefore not disclosed or suggested by Matzner.

In addition, none of the cited references discloses cassette units containing intermediate walls in addition to the bent perforated wall segments. Moreover, none of the cited references discloses such intermediate walls formed as double walls. In the presently claimed invention the bent perforated wall segments together with the intermediate walls formed as double walls form the screen pockets which have a larger screening area relative to their overall planar size than the constructions disclosed in the cited references. For the reasons set forth above, Applicant respectfully submits that amended independent claim 1 is allowable over the cited references.

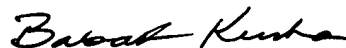
Claims 2-10 depend from amended independent claim 1 and, therefore, include all the features and elements thereof. Furthermore, the dependent claim adds further distinguishing features of particular utility. Accordingly, Applicant submits that dependent claims 2-10 are also allowable over the cited references, at least for the reasons set forth above.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,



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Attachments

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